MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) COMPLIANCE INSPECTION

INSPECTION CONDUCTED: September 13, 2011
FINAL REPORT DATE: January 3, 2012

CITY OF COEUR D'ALENE
MS4 PERMITTEE
IDAHO

United States Environmental Protection Agency
Region 10
1200 Sixth Street
Seattle, WA 98101

Contents

Section 1.0 Introduction

In the summer of 2011, Julie Congdon, Compliance Officer, U.S. Environmental Protection Agency (EPA) Region 10, conducted a file review of the City of Coeur d'Alene's Municipal Separate Storm Sewer System (MS4) Program. All of the MS4 Annual Reports were reviewed for compliance with the permit requirements. On September 13, 2011, an EPA Region 10 inspection team conducted a field inspection of the Pocatello MS4.

Discharges from the City's MS4 are regulated under the National Pollutant Discharge Elimination System (NPDES) Permit No. IDS-028215 of Section 402(p) of the Clean Water Act, 33 U.S.C. §1342(p), and EPA's "Phase II" regulations for MS4 discharges, published in the Federal Register on December 8, 1999, 64 Fed. Reg. 68722 (hereafter, the Permit). The Permit is the first NPDES MS4 permit issued to the City of Coeur d'Alene (hereafter, the Permittee or the City). The Permittee submitted an application for NPDES permit coverage dated March 2003, and an application amendment in November 2007. The Permittee received confirmation of coverage from EPA effective January 1, 2009 and was subsequently issued NPDES Permit No. IDS-028215.

The Permittee's MS4 serves a population of approximately 42,000 residents within the City limits covering approximately 13.79 square miles. The City directly abuts the northern shore of Lake Coeur d'Alene. The Permittee identified in an updated MS4 map in October 2007, the location of 11 outfalls that discharge to the Spokane River, Lake Coeur d'Alene, Fernan Creek and Fernan Lake. While soils allow infiltration of rain and snowmelt in much of the greater Coeur d'Alene area, the Permittee's MS4 also discharges to waters of the U.S. during wet weather. The Spokane River and Lake Coeur d'Alene support cold water aquatic life, salmonid spawning, primary contact recreation, wildlife habitats and aesthetics, and domestic water supplies. Lake Coeur d'Alene also serves as a special resource water.

The primary purpose of the file review and field inspection was to assess the Permittee's compliance with the requirements of the Permit through an assessment of the Permittee's implementation of applicable program elements. Specifically the file review and field inspection included an evaluation of the following program areas or elements, which are described in the Permit:

Part II.B.1	Public Education and Outreach
Part II.B.3	Illicit Discharge Detection and Elimination
Part II.B.4	Construction Site Storm water Runoff Control
Part II.B.5	Post-Construction Storm water Management
Part II.B.6	Pollution Prevention and Good Housekeeping for Municipal Operations

The inspection was an announced one: a notification letter was sent to Gordon Dobler, City Engineer, on July 25, 2011. The EPA Inspection Team, Dustan Bott, Sandra Brozusky, and Julie Congdon, conducted a series of interviews with members of the Permittee's staff, along with several site visits and field verification inspections. Dry weather conditions were experienced

during the inspections. A copy of the Permit can be viewed at http://yosemite.epa.gov/r10/water.nsf/NPDES+Permits/MS4+requirements+-+Region+10/$FILE/ATT5M8LM/IDS028215%20FP%20Coeur%20dAlene%20MS4.pdf. Mr. Bott, Ms. Brozusky, and Ms. Congdon presented their credentials to the City representatives at the opening conference beginning at 9:00 A.M. The inspection concluded with a closing conference with Gordon Dobler and Kim Harrington. The primary representatives involved in the inspection were the following:

City of Coeur d'Alene Representatives:	Gordon Dobler, City Engineer (208)-769-2216 Kim Harrington, Assistant Project Manager (208)-769-2214
EPA Inspectors:	Dustan Bott, EPA Region 10 Sandra Brozusky, EPA Region 10 Julie Congdon, EPA Region 10

Section 2.0 Permit Compliance Review

The EPA Inspection team conducted an evaluation of the Permittee's MS4 program to assess compliance with the requirements of the Permit and their implementation of applicable program elements to ensure an effective MS4 program. As stated previously, the Permittee maintains coverage for discharges from its MS4 under NPDES Permit No. IDS-028215. The Permit became effective on January 1, 2009.

As required by Part II.B of the Permit, "Minimum Control Measures," the Permittee must accomplish six minimum control measures through their Storm Water Management Program. The Permittee were required to fully implement their SWMP within four years of January 1, 2009. Based on a review of the conditions of the Permit and the Permittee's Annual Report, only those program elements required two years from the permit effective date should have been fully implemented and functional at the time of the inspection.

The following sections discuss the findings from the file review, conducted by Julie Congdon, and the field inspection, conducted by Dustan Bott, Sandra Brozusky, and Julie Congdon. The presentation of file review and inspection findings in this section of the report does not constitute a formal compliance determination or violation. All referenced documentation used as supporting evidence is provided in Appendix A, and photo documentation is provided in Appendix B.

Section 2.1 Annual Report

The purpose of an Annual Report is to document implementation of the SWMP during the previous year; evaluate program results and to describe planned changes towards continuous improvement of the program.

A file review of the MS4 was conducted by Julie Congdon in advance of the field inspection. Because the 2010 Annual Report had not been sent to EPA, the compliance officer visited the Permittee's storm water webpage to try and view it. The link on the webpage (http://streets.cdaid.org/index.php/annual-report) did not result in the Annual Report, only a blank white screen. However, by sheer guesswork, the compliance officer was able to download a copy of the Annual Report by clicking on the small printer icon. Not all visitors to the webpage might think to do this. The Annual Report does not appear to be made easily acceptable to those visiting the storm water webpage.

All of the MS4 Annual Reports were reviewed for compliance with the permit requirements. Overall, the information provided in the Annual Report was informative regarding the City's implementation of the minimum control measures and its program activities, but some information was lacking. In order to get a clearer understanding about the Permittee's compliance, EPA provided a list of questions to the Permittee in advance of the field inspection, requesting additional information to augment the information provided in the Annual Reports (See Appendix A for more information). The responses from the Permittee are noted in the bulleted sections below.

Section 2.2 Public Education and Outreach

In accordance with the specific requirements at Part II.B.1.a-e of the Permit, the Permittee must implement a public education program to educate the community about the impacts of storm water discharges to the MS4 and local waterbodies. Overall, the Permittee has implemented a good program to educate and inform the public about storm water issues.

Findings from the File Review

1) While the Environmental Open House held on September 9, 2010 served to disseminate information on storm water management, water conservation and other environmental topics, this event did not serve to fulfill Part II.B.2.d, in which the Permittee is required to solicit input from the public on the Permittee's implementation of the SWMP activities. If that was part of the intent of the event, no information was provided in the Annual Report regarding the public's input and feedback on the Permittee's SWMP work.
    - The Permittee indirectly addressed this lack of information in response to EPA's Question 3 regarding how the Permittee has tracked behavior changes in their general and target audiences. The Permittee noted that it solicits public

comments at its open house events. Though no comments were received, attendance at the second open house event increased significantly, which would indicate that the public is interested in storm water issues.

- The Permittee was also asked if it engages in household hazardous waste collection events; the Permittee responded to Question 4 that it participates in an advisory committee that promotes recycling and safe disposal.

Findings from Field Inspection

1) During the inspection, Mr. Dobler and Ms. Harrington described the various environmental outreach avenues the City has done. The City puts up informational booths or does presentations on storm water and the environment when possible. Venues range from the Environmental Open House at the Library to school classrooms to Silverwood Amusement Park.

Section 2.3 Public Involvement/Participation

Part II.B.2 of the Permit requires the Permittee to provide the public an opportunity in the development and implementation of the public involvement program.

Findings from the File Review

1) It is positive to see that the Permittee established the storm water "hotline" ahead of the third year deadline. It is unclear as to how the Permittee is informing the public about the hotline; the hope is that the Permittee will increase its outreach and education efforts to the public regarding the hotline so as to ensure the public is aware of it and is making full use of the hotline.
2) The Permittee achieved well above the requirement for storm drain stenciling. The permit required that, within two years of the effective date of the permit, at least 100 storm drains, catch basins or inlets in the Permittee's jurisdiction must be stenciled each year. The Permittee stenciled 600 drains, not including the 80 metal storm drain markers.

Findings from Field Inspection

1) Regarding outreach for the storm water hotline, City staff said that the City does have a telephone number hotline (set up in early 2010) posted on the Storm water page of the City's website for "for Storm water concerns / spill reporting or to report illegal dumping". City staff indicated that the hotline number has been advertised on brochures, pamphlets and on Public Service Announcements on TV. Any calls that come in on this hotline and any other complaints / issues that are called in to the City outside of this hotline are tracked internally.

Areas of Concern

1) On page 4 of the Annual Report, it is stated that information about the Adopt-a-Street Litter Pick-up program is available on the City of Coeur d'Alene website. The compliance officer reviewed the website (on May 20, 2011) and could not find information about the program, even after using the website's search function.

Section 2.4 Illicit Discharge Detection and Elimination

Part II.B.3 of the Permit requires the Permittee to develop, implement and enforce a program to detect and eliminate illicit discharges to the MS4 in accordance with the specific requirements in Part II.B.3.a-g of the Permit. The findings from the file review and the field inspection are noted in separate sections below.

Findings from the File Review

1) In Part II.B.3.a of the Permit, the Permittee must develop and implement a program that includes written procedures for detection of spills, identification of the source of spills, and removal of non-storm water discharges from the MS4 in order to ensure protection of the MS4. In reviewing the Spill Response Plan included in Appendix B of the 2010 Annual Report, it is unclear as to what the specific procedures are regarding detecting the spills and the identification of their source. Also, several local agencies are identified as functioning as the responders to any spill incidents. However, it is unclear and unknown if those agencies have standard operating procedures (SOPs) for spill response that ensure the protection of the MS4.
2) Also as required in Part II.B.3.a of the Permit, the Permittee must develop an information management database system to track the activities and actions of the program. A copy of this database or other information regarding this system was not provided in the Annual Report. It was unknown if this system has been developed or is being utilized.
    - EPA requested a copy of this database as part of the pre-inspection questions. The Permittee provided a copy of the database. Of the 47 illicit discharge reports and complaints received, 5 ranked "High" priority, 16 were of "Medium" priority, and 26 were "Low" priority. However, of these 47, some appeared to be tests of the system.
3) In Part II.B.3.b, the Permittee is required to implement appropriate enforcement procedures and actions, including a written policy of enforcement escalation procedures for recalcitrant or repeat offenders. In reviewing the 2010 Annual Report, it was not clear that the Permittee had implemented enforcement procedures and actions; there was no reference to the development and/or implementation of a written policy of escalation procedures.
4) In Part II.B.3.d, the Permittee must provide a copy of the completed comprehensive MS4 map as an electronic file via ARC GIS format to EPA as part of the corresponding

Annual Report. An electronic copy of this map was not submitted to EPA with the 2010 Annual Report.

- The Permittee was asked to provide an electronic file copy via Arc GIS format of the completed comprehensive MS4 map, denoting the following: jurisdictional boundaries; location of all City-owned or operated storm sewers, culverts, ditches, and other conveyances; locations of all inlets and outfalls, including their latitude and longitude, and diameter of all outfalls; names and locations of all waters that receive discharges from those outfalls; points at which the City's MS4 is interconnected with other MS4s; and locations of all municipally-owned or operated facilities, including maintenance/storage facilities and public or private snow disposal sites.

5) On page 66 of the 2010 Annual Report, "Staff Training" was mentioned but lacked sufficient information regarding the training.
    - In the pre-inspection list of questions, EPA asked for a description of the training noted on page 66, including a summary of what topics covered in the training, the date(s) that the training(s) occurred, a list of City departments in attendance, etc. In response to Question 5, the Permittee stated that staff from the Water, Parks, Recreation, Engineering and Maintenance departments participated in the training. The Permittee further noted that a video titled "Storm Watch: Municipal Storm water Pollution Prevention" was presented at the training. The Permittee stated that the topics covered in the training included good housekeeping, spill prevention, vehicle and equipment washing and maintenance, spill reporting and response, street maintenance, landscape and lawn care, storage of materials and waste, identification of illicit discharges and reporting. "Two sessions were held," noted the Permittee, "August 25, 2010 and October 11, 2010."

Findings from Field Inspection

1) Mr. Dobler indicated that the City has not had to do any enforcement escalation related to illicit discharge as of yet because there has not been a need to do so. For those facilities that have had issues, they have been contacted and corrected any deficiencies.
2) The City has a general spill response plan. Mr. Dobler indicated that the City Fire Department has had a spill response plan for a very long time. The Fire Department also has a Hazmat Team to respond to incidents citywide as needed. If a spill is beyond a certain volume, the Idaho Department of Environmental Quality (IDEQ) is notified. IDEQ then decides if they become involved in the incident or not. The Panhandle Health District, a local government agency, would get involved in a spill or discharge that goes into a dry well in the City (or elsewhere within their district).
3) City staff said that the City does have a telephone number hotline (set up in early 2010) posted on the storm water page of the City's website for "for storm water concerns / spill reporting or to report illegal dumping". City staff indicated that the hotline number has been advertised on brochures, pamphlets and in Public Service Announcements on

TV. Any calls that come in through the hotline and any other complaints or issues that are called in to the City outside of this hotline are tracked internally.

4) Regarding the information management database for illicit discharge report and complaints, the City said that whoever enters the report in the system is the one who assigns it a rank of "High", "Medium", or "Low" so how that rank is determined can be subjective, depending on who enters it in. However, Mr. Dobler and Ms. Harrington are able to change the ranking in the system. Also, they are the ones who do the follow-up on the reports.
5) The City has begun using a remote control video camera to inspect the storm sewer system. Mr. Dobler stated that they have begun in the commercial corridors of the MS4. They are working on the system near Sherman Avenue now, and will then move on to 4th Street area of the MS4.

Section 2.5 Construction

As stated in Part II.B.4 of the Permit, the Permittee "must develop, implement, and enforce a program to reduce pollutants in storm water runoff to the MS4 from construction activities resulting in land disturbance of one acre or more". The program must include, at a minimum, the specific requirements in Part II.B.4.a-h of the Permit. Based on the implementation plan and time frames required in the Permit, the construction-related program elements were required to have been fully implemented at the time of inspection.

Findings from File Review

1) The Permittee is ahead of schedule in conducting training to the construction/design/engineering audience; it is also positive to note that 3 presentations were made on the construction ordinance and BMP requirements.
2) No information was provided in the Annual Report regarding how many construction plans were reviewed and/or approved, per Part II.B.4.e of the Permit.
    - In response to Question 8, the Permittee stated that 1,000 plans had been reviewed between January 1, 2009 and August 4, 2011.
3) No information was provided regarding the process to address deficiencies in the plans.
    - In its answer to Question 8, the Permittee noted that the process to address deficiencies or incompleteness on Single Family Residential (SFR) construction plans begins with Dennis Grant, Project Manager, reviewing the construction plans. When Mr. Grant reviews the plans for SFR homes, he requires the contractor, who took out the permit, to implement the following Storm water Best Management Practices (BMPs), which include "Stabilized Construction Entrance, Use BMP for Waste Management, Use BMP for Concrete Waste Management, Use BMP for Inlet Protection, Drywell Inlet Protection, (and) Silt Fence". It was noted that "These can be found in the September 2005 IDEQ Storm water BMPs Catalog and the Revised April 2008 City of Coeur d'Alene Standard Drawings Manual. The above items are listed on each SFR construction

site plan to make them complete and not allowing any deficiencies. Therefore, the contractor knows ahead of time what is required for Storm water runoff and must implement all of these Storm water BMPs on the construction site. The process for Commercial projects starts in the Project Review where the Architect and Design Engineer are notified that they will need to submit an Erosion Control Plan. If the site is over one (1) acre and drains to the waters of the United States they are told that they need to submit a SWPPP. When the plans are reviewed, Marlene Musch, Engineering Technician, requires the contractor to follow the Erosion Control Plan or BMP's before a permit is issued".

4) There was no information regarding the training of staff that reviews erosion and sediment control plans. It was also unclear when and/or how often staff was trained in the review of plans (e.g., once they become aware that plan review is one of their job responsibilities; or every other year?)
    - In response to Question 9, the Permittee noted that staff who "perform plan reviews are CESCL certified and have SEEP (Storm water Erosion Education Program) certifications. A checklist is completed and any additional guidance and or training is supplied by the City Engineer. Training is on- going."
5) It was not fully clear how the Permittee was complying with the Construction General Permit (CGP) in terms of its own and its contractors' compliance per Part II.B.4.h of the Permit.
    - In response to Question 10, the Permittee noted that it "is our policy to require CGP coverage on city projects disturbing less than one acre of ground but are part of a larger common plan of developing *(sic)* (ment) disturbing one acre or more of ground. These requirements are reflected in the project specifications which are part of the contract by reference".

Findings from Field Inspection

1) Mr. Dobler indicated that the City has not had to do any enforcement escalation related to construction oversight as of yet because there has not been a need to do so. For those facilities that have had issues, they have been contacted and corrected any deficiencies. The City does have a system in place to inspect construct sites and provide regulatory oversight. The City has two employees for this role, Marlene Musch and Shane Roberts. Ms. Musch is CESCL certified and inspects projects and provides erosion and BMP enforcement. Mr. Roberts inspects for erosion controls on bigger projects. Mr. Roberts inspects construction sites regularly inspect for a variety of project aspects such as streets, pipes, and storm water.
2) The City has a plan review process that includes an assessment of proper erosion controls, stabilized entrances and waste management. The Engineering Department conducts plan reviews and ensures that these controls are in place. Projects that the City's Street Department does also go through plan review.
3) At the time of the inspection, the City has had two construction projects with CGP coverage and SWPPP's. Mr. Dobler indicated that the City gets coverage under the EPA's Construction General Permit (CGP) for any of their projects over 1 acre. He said they

expect others within the City to get CGP coverage for any construction projects over 1 acre.

4) The City takes part in BMP Demo Days, an event that is aimed at contractor education. BMP Demo Days is a two day event that will take place twice in the fall of 2011 (9/13-14/11 and 10/18-19/11).
5) Mr. Dobler indicated that the City doesn't require contractors to be SEEP certified to work on construction projects in the City. Mr. Dobler did say that many City employees are SEEP certified, such as their inspectors, and staff in Engineering and the Water Department.
6) At the time of the inspection, EPA inspectors viewed the construction project management database, which is an internal program built for tracking construction activity in their jurisdiction. Staff have the ability to filter the database to examine any sites that have had to make corrections on the site. A "partial" inspection in the database indicates that Ms. Musch went back to a construction site to ensure that any required correction to the site was done as the City expected it done.

Section 2.6 Post-Construction

The requirements in Part II.B.5 of the Permit must be completed within three years of the effective date of the Permit (except for Part II.B.5.d, which is four years), thus the Permittee was not evaluated on these components.

Findings from File Review

There was no information in the Annual Reports regarding components of the Permittee's Post Construction program but with consideration of the requirements' deadlines, this area did not need to be evaluated at this time.

Section 2.7 Pollution Prevention and Good Housekeeping

Part II.B.6 of the permit requires the Permittee to develop and implement an operation and maintenance program to prevent or reduce pollutant runoff from municipal operations. The program must include, at a minimum, the specific requirements in Part II.B.6.a-d of the Permit.

The City's municipal facilities are located outside of their MS4 system. As a result, these facilities were not visited during this inspection.

Findings from File Review

A number of questions arose regarding the Permittee's Pollution Prevention program based on the lack of information in the Annual Reports.

1) In response to Question 11, the Permittee provided information on the operation and maintenance program for the following materials:

- Use of sand and road deicers, including the storage locations of and/or amounts used of deicing salts and/or abrasives
  i) The Permittee noted the "City of Coeur d'Alene uses both road deicers and sand sparingly with the focus on safety to the community. Deicers are used on arterial streets where volumes of traffic help carry the product. This allows use (of the material) to be kept to a minimal amount. Temperatures above 18 degrees are optimum.
  ii) "Sand is used only when roads become glazed with ice. Normally this will occur in residential side streets and that time we treat only major stops coming onto arterials; hills and tight corners.
  iii) "Last year we used 87,000 gallons of de-icer and 650 tons of sand. We make and store our own deicer. We have only one storage site and it is here at the corporate shop at 3800 Ramsey Road. This site is monitored by the Idaho Panhandle Health District".
- Storage locations of and/or amounts used of pesticides and fertilizers in municipal maintenance and operations
  i) "Materials are stored at 811 N 8th St. and 1053 N C St. (never for more than a week, used as ordered.) Fertilizer (amount is) approximately 105,000 pounds per year".
- Fleet maintenance and vehicle washing operations
  i) "The shop includes a vehicle maintenance washing facility. All vehicles brought to this site including patrol vehicles are cleaned after servicing. This bay goes in to the wastewater pipe that is cleared through the treatment plant. The steam cleaner site is drained into an oil/ water sump that is cleaned yearly by a disposal company".
- Street cleaning and maintenance
  i) "Sweeping is done on arterials at least once per month during March to October. Residential streets are swept at least five times per year. In addition, litter on city streets are is routinely removed by volunteers in our Adopt a Street Program".
- Grounds/park and open space maintenance operations
  i) "Staff training is provided annually in spill prevention, proper clean up techniques and illicit discharge detection".
- Building maintenance
  i) "Spill Prevention & Response Plans have been developed for each building. Staff have also received training in spill prevention and proper clean up".
- Storm water system maintenance
  i) "Maintenance is performed when a deficiency is found (through) video inspection results, reported concern or field observation. Outfalls are inspected at least once per year to see if maintenance is required due to vegetation or other debris".

- Snow removal practices
  i) "All of the snow that falls is plowed to the curb line to melt. The only snow that is removed and hauled to storage sites is the snow that falls in the downtown business district".
- Snow disposal site operations and maintenance
  i) "The snow is allowed to run into swales or melt in place. Any trash let after the snow has melted at our snow disposal sites is removed".
- Materials storage
  i) "All City departments use best management practices in our materials storage such as MSDS information on site, secondary containment where required and spill prevention/clean up training to supervisors. Panhandle Health District also conducts biennial site inspections at our Street, Water, Parks, Cemetery and Wastewater facilities".
- Hazardous materials storage
  i) "All City departments use best management practices in our materials storage such as MSDS information on site, secondary containment where required and spill prevention/ clean up training to supervisors. Panhandle Health District also conducts biennial site inspections at our Street, Water, Parks, Cemetery and Wastewater facilities".
- Used oil recycling
  i) Emerald Disposal Co. is used to pick up and dispose of our used oil and antifreeze.
- Information was not applicable for the following:
  - Spill control and prevention measures for municipal refueling facilities,
  - Municipal golf course maintenance,
  - Solid waste transfer activities, and
  - Water treatment plant operations.

2) Information was lacking regarding how areas within the MS4 are targeted for maintenance.
   - In response to Question 12, the Permittee noted that "areas within the city with the highest volume of trees" are targeted for a higher frequency of maintenance. It was also noted in the response that the "criteria for increased maintenance are determined by field crew assessment and public reporting", specifically Tim Martin in the City Street Department and Gordon Dobler in the Engineering Department.
3) There was also insufficient information regarding the number and frequency of inspections of municipal facilities, including maintenance yards.
   - In response to Question 13, the Permittee stated, "As part of our good housekeeping, spill prevention, and safety policies, all employees are responsible to <u>continuously</u> inspect their work areas. Panhandle Health District inspects our Street Department, Water Department, Waste Water Treatment Plant and our Parks and Cemetery Shop. The inspections include a critical materials evaluation and are performed every two years".

4) In the 2010 Annual Report, it was noted that 24,487 feet of storm lines were inspected and cleaned. However, it was unclear what percentage that amount comprised of the MS4's storm lines.
   - In response to Question 14, the Permittee noted that "As of July 30, 2011, there is approximately 382,163 feet of known storm water piping in the city limits", thus 9.1% of the storm water piping system was inspected and cleaned.
5) Information was lacking regarding several areas of maintenance of the storm sewer system.
   - In response to Question 15, the Permittee provided information regarding the following:
     i. the number and frequency of catch basin inspections and cleanings: "Year to date, 1547 catch basins have been inspected and cleaned. Our goal is 1400-1700 per year. Catch basins are inspected as they are cleaned typically once per year. Inspections also occur during video and jetting for maintenance concerns or if a problem or concern is reported".
     ii. street sweeping' frequency and miles covered: "Residential streets are swept up to 5 times per year and arterials once per month from March thru October. Year to date, 468.5 center miles of residential and 230 center miles of arterial roadways".
     iii. the number and frequency of pipe inspections and cleaning: "As of July 30, 2011 there is approximately 382,163 feet of known storm water piping within the city limits. Video inspection is a continuous effort, year to date 15469 feet. Cleaning is also continuous".
     iv. the number and frequency of inspections and/or cleaning of storm water management structures, both those that are publicly-owned and privately-owned: the Permittee stated that this was not applicable.
     v. the frequency of open channel inspections and cleaning: The City does not inspect or maintain open channels outside of our right of way. We have very few open channels inside our right of way. These are inspected on an as-needed basis".
6) The Annual Reports lacked information and data regarding volume and/or weight of trash and debris removed from the area of the MS4.
   - In response to Question 16, the Permittee stated, "Tonnage from street sweeping and catch basin cleaning, year to date (is) 1544 (tons). Tonnage from city wide leaf pick-up year to date (is) 1551 (tons)."
7) Information was insufficient with regard to the training as required in Part II.B.6.b of the Permit. The Permittee was asked to provide a description of the training for municipal employees, including a list of what City departments were in attendance (who presented the training, who received the training), date that the training occurred, etc.
   - In response to Question 17, the Permittee noted, "The participants included staff from our Water, Parks, Cemetery, Recreation, Engineering and Maintenance staff members. A video produced by Excal Visual entitled Municipal Storm water Pollution Prevention; Storm Watch was presented at the training events. Topics covered: Good Housekeeping, Spill Prevention, Vehicle and Equipment Washing and

Maintenance, Spill Reporting and Response, Street Maintenance, Landscape and Lawn Care, Storage of Materials and Waste, Identification of Illicit Discharges and Reporting. Two sessions were held, August 25, 2010 and October 11, 2010. Information was presented by Kim Harrington, Engineering (Department)".

- It was also noted in the response to Question 17 that a training was held on April 27, 2011 on the topic of "Spill Control and Containment Training with a continuation of Spill Clean Up & Diversion Training (on) May 26, 2011". Departments participating in the training included Building, Fire, Parks, Police, Recreation, Street, Wastewater, Water, Maintenance, Engineering and Legal. Information was presented by Mike Mather, Northern Lakes Fire Department and Bill Deruyter, Coeur d'Alene Fire Department. Training for staff occurs annually.

Findings from Field Inspection

1) The City does not have any maintenance facilities, fueling locations, or fleet storage facilities located in the MS4. As a result, these locations were not visited during the inspection.
2) The City has stenciled 600 storm drains (See Photo 9 in the Photograph Log in Attachment B of this report) in their MS4 with the help of the Department of Labor, who oversees volunteer work for "at risk" teens. In addition 60 metal stamps were also placed at storm drains in more pedestrian areas (See Photo 10).

Section 2.8 Monitoring, Recordkeeping and Reporting Requirements

As stated in Part IV.C of the Permit, the Permittee is required to report on the storm water discharge monitoring data they have collected. Additionally, they are to prepare and submit an Annual Report.

Findings from File Review

1) In Part II.C.3, the Permittee must submit a section of the SWMP that specifically identifies how the Permittee will evaluate and measure the effectiveness of the SWMP to control the discharge of the pollutant(s) of concern. This section of the SWMP was not submitted as part of the first Annual Report.
2) It was unclear how the Permittee is evaluating and measuring the effectiveness of the SWMP per Part II.C.3.
   - In response to Question 18, the Permittee stated, "We began our inspections for BMP's this year and what we are observing in the field is compliance with the requirements. The inspection process has provided us with an avenue to communicate storm water information to builders and contractors. We have completed our first year of storm water sampling and have exceeded the number of required samples in order to better calculate our loads. (With regard to) City projects, staff have developed and implemented policies to protect storm water

quality on all city projects. Supervisors have taken the lead in implementing practices such as catch basin protection. Staff is serving as an example to the public. We have been invited to present storm water educational information at events, (for) example Earth Day 2011 and Science Day at Silverwood Theme Park".

Findings from Field Inspection

1) EPA staff visited the City's two monitoring locations during the inspection. One monitors an outfall (Outfall 1) entering the Spokane River and represents a more commercial environment (See Photos 1 and 2). The other monitoring station (See Photos 7 and 8) monitors an outfall (Outfall 11) to the Coeur d'Alene Lake and represents a more residential environment.
2) Terry Leigh, Storm Water Maintenance Lead for the City, joined the inspection at Monitoring Station 2, which was the first stop of the field visit. Mr. Leigh is knowledgeable of the City's MS4 and provides sampling support to Ms. Harrington, who leads the City's monitoring efforts. Ms. Harrington and Mr. Leigh were present for the field tour.

Areas of Concern

1) In Part II.C.3, the Permittee is required to include in the Annual Report a description of how the activities in each of the minimum control measures in Part II.B will be targeted by the Permittee to control the discharge of pollutants of concern. In the Annual Report, it appeared that the "Information for Reviewers" on page iv was intended to satisfy this permit requirement; however, it lacked specificity in identifying how the Permittee will evaluate and measure the effectiveness of the SWMP to control the discharge of the pollutant(s) of concern. A more detailed description and discussion would be more enlightening on the success of the Permittee's program.

Section 3.0 Additional Observations and Recommendations for Improved Storm water Management by the Permittee

At the end of our inspection, a closing conference was held with Mr. Dobler, Ms. Harrington, and Mr. Leigh. No areas of concern were identified at the time of the inspection.

- Ms. Congdon and Mr. Bott had a post inspection meeting with Misha Vahoc, the EPA R10 MS4 Permit writer, and the topic of road deicers was discussed. In Part II.B.6.a of the Permit, the City's program "must address municipal activities occurring within the permittee's jurisdiction with potential for negative storm water related water quality impacts, including: the use of …road deicers". In reviewing the permit file after the inspection, the file included a letter to Tim Martin, the Street Superintendent for the City of Coeur d'Alene from the Idaho Department of Environmental Quality (IDEQ),

dated December 7, 2009 signed by Thomas Herron, the Surface Water Manager for the IDEQ Coeur d'Alene Regional Office. The letter expressed concerns regarding the City's use of concentrated sugar beet byproduct (CSB) as a component in the City's deicing agent in road deicing. IDEQ's concerns were related to the amounts and concentrations of total phosphorus (TP), chemical oxygen demand (COD) and biochemical oxygen demand (BOD) produced by the deicing agent mixture used by the City. The file contained no information regarding any subsequent response from the City to IDEQ.

- It is recommended that the Permittee engage more actively in household hazardous waste collection events. At such events, the Permittee could directly educate the public on the important role the public has in safely disposing of these wastes rather than allowing them to leak and get pollutants into storm water.

Inspectors Signatures:

Dustan Bott _____

Julie Congdon _____

Sandra Brozusky _____

Appendix A:

Exhibit Log

- **Pre-Inspection Questionnaire from U.S. EPA**
- **Pre-Inspection Questionnaire Answers from the City of Coeur d'Alene**

Appendix B:

Photograph Log

Unless indicated otherwise, all photographs were taken by Sandra Brozusky on September 13, 2011.

Photo 1 (P9130499): This is a picture of the City's monitoring station (referred to as monitoring station #2) at outfall #1 or what is also known as SR #4 on the Spokane River (see photo 2). Monitoring station 2 includes a flow meter, a rain gauge, and a sampler. Both monitoring stations that the City uses are set to send a notice to Ms. Harrington if it rains a certain level. Once she is notified, Ms. Harrington goes to the stations and takes a sample.

Photo 2 (P9130501): This is a picture of outfall #1, which is also known as SR #4, which is short for Spokane River outfall #4.

Photo 3 (P9130504): This is another view of outfall SR #4.

Photo 4 (P9130505): The red arrow indicates the City's outfall SR #3 on the Spokane River. At the time of the inspection, the City was exploring the possibility of adding another monitoring station on the River at this outfall.

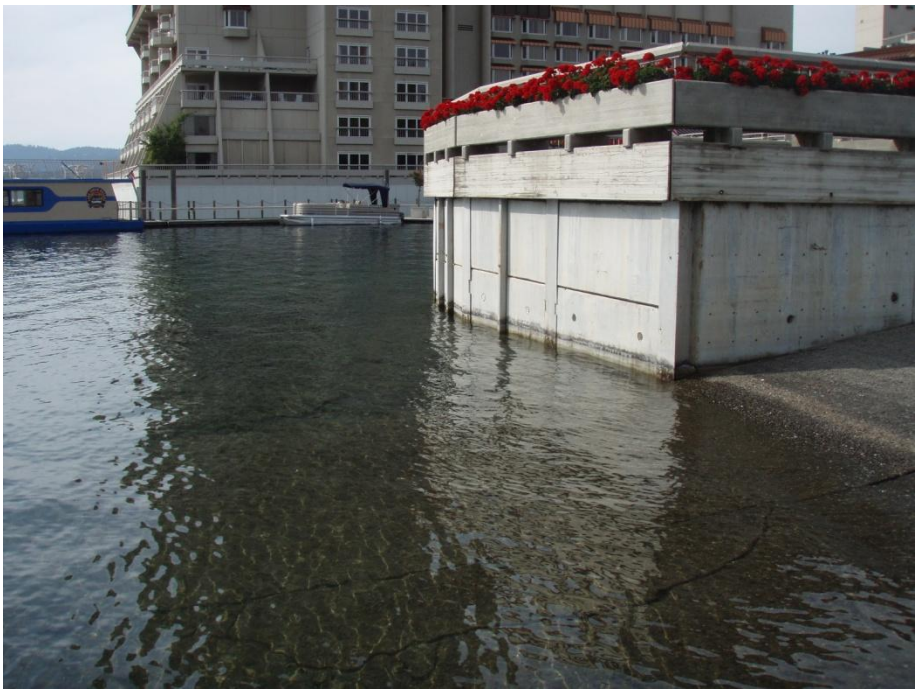

Photo 5 (P9130507): On the day of the inspection, the City's outfall (Outfall #3) on the Coeur d'Alene Lake at this location is underwater. This outfall is located near the Coeur d'Alene Resort and adjacent to the 3rd Street boat ramp. See Photo 6 for a picture of the outfall during lower water levels.

Photo 6: This photo was provided to the EPA by City of Coeur d'Alene staff via email after the inspection. This photo is taken from the same location as Photo 5 but during low Coeur d'Alene Lake water levels.

Photo 7 (P9130508): This is the monitoring station 1 located on Fernan Creek at outfall #11, also known as FC #1. This outfall and monitoring station is located at 19th and Young Street in Coeur d'Alene. Monitoring station 1 includes a flow meter, a rain gauge, and a sampler.

Photo 8 (P9130511): This is a view inside the manhole access to Outfall #11.

Photo 9 (P9130512): This is an example of a storm water drain stenciled per permit requirements for storm drain labeling. This drain is located at 19th and Young Street.

Photo 10 (P9130512): This is an example of a storm water drain decal per permit requirements for storm drain labeling.